

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

United States of America,

Plaintiff,

v.

Civil No. 19-2257-JPM-cgc

Sixty-Four Thousand Five Hundred Fourteen
Dollars, Seventeen Cents (\$64,514.17)
in U.S. Funds from Four (4) Assorted Wells
Fargo Bank Accounts,

Defendant.

AFFIDAVIT OF DEFAULT

Pursuant to 28 U.S.C. §1746, the undersigned attorney for the plaintiff states as follows:

1. He is an Assistant United States Attorney for the Western District of Tennessee and represents the United States of America in this action.
2. A Verified Complaint of Forfeiture was filed in this action on April 25, 2019.
3. The United States Marshal executed process against and attached the defendant property on May 29, 2019.
4. The following parties were served with notice of this action by federal express mail service on May 29, 2019: Drug Enforcement Administration and Wells Fargo Bank. Notice of this action was returned unexecuted as to Juan Lan Zhen. On May 31, 2019, federal express mail service attempted to deliver notice of this action to Juan Lan Zhen. However, Zhen refused the package delivery.
5. The United States, as ordered by this Court, also gave public notice of this action by advertisement on the government web site www.forfeiture.gov for 30 consecutive days beginning on April 29, 2019.

6. To the best of affiant's knowledge and belief, no known potential claimants are presently in the military service of the United States or are infants or incompetent persons.

7. That all persons and entities believed by the deponent to have any possible claim to the defendant property were notified and served with a copy of the Complaint for Forfeiture.

8. That no claim with respect to the defendant property has been filed; no one has pled or defended in this action; that the time for presenting a claim and answer has expired; and, therefore, upon information and belief, a default exists as to the defendant property.

Under penalty of perjury, the undersigned declares the foregoing to be true and correct.

Executed this 13th day of March, 2020.

/s Christopher E. Cotten
CHRISTOPHER E. COTTEN
Assistant United States Attorney